

# **Exhibit 2**

UNITED STATES PATENT AND TRADEMARK OFFICE

---

BEFORE THE PATENT TRIAL AND APPEAL BOARD

---

NOKIA OF AMERICA CORPORATION  
Petitioner

v.

TQ DELTA, LLC  
Patent Owner

---

Case No. IPR2022-00471  
Patent No. 8,462,835

---

**DECLARATION OF M. SCOTT STEVENS  
IN SUPPORT OF PETITIONER'S REPLY  
TO PATENT OWNER'S PRELIMINARY RESPONSE**

I, M. Scott Stevens, declare as follows:

1. I am a partner at the law firm of Alston & Bird LLP, counsel for Nokia of America Corporation (“Nokia”). I make the following statements based upon my personal knowledge or on information and belief where indicated and, if called upon to testify, would testify competently to the matters contained herein.
2. Nokia petitioned for *inter partes* review of U.S. Patent No. 8,462,835 (the “’835 Petition”) on January 21, 2022.
3. Prior to Nokia filing any petition for *inter partes* review, at least on March 11, 2016 and May 25, 2021, TQ Delta sent claim charts to Nokia alleging infringement of certain claims of U.S. Patent Nos. 8,462,835; 8,495,162; 7,836,381; 7,844,882; 8,276,048; 8,495,473; and 7,453,881, among others, as a result of alleged correspondence with DSL standards. To date, Nokia has filed petitions for *inter partes* review on each of the seven patents listed above.
4. Although Nokia’s ’835 Petition is a “copycat” petition of CommScope’s earlier filed petition, Nokia’s decision to file its petition was independently made and not at the behest or request of 2Wire or CommScope.
5. Nokia has not engaged in any type of agreement or arrangement with 2Wire and/or CommScope regarding the substance of any petition, divvying up patents, or making decisions regarding the filed IPRs.

6. Nokia did not and does not have any control over the 2Wire litigation, the CommScope litigation, or any of CommScope's IPRs.
7. 2Wire and CommScope have had no control over Nokia's decisions regarding the petitions for IPR it has filed, and 2Wire and CommScope did not provide input or consultation on Nokia's decisions.
8. Nokia is not a proxy for 2Wire or CommScope.
9. Nokia did not file the '835 Petition at the behest of 2Wire or CommScope.
10. Neither CommScope nor 2Wire funded, directed, controlled, or were in any way involved in the petitions for IPR filed by Nokia.

I hereby declare that all statements made herein of my own knowledge are true and that all opinions expressed herein are my own; and further that these statements were made with the knowledge that willful false statements and the like are punishable by fine or imprisonment, or both, under Section 1001 of Title 18 of the United States Code.

Dated: June 28, 2022

Respectfully submitted,

/ M. Scott Stevens /

M. Scott Stevens